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15 Attorneys for Plaintiffs DORA SOLARES  
16 [Counsel for Defendants on signature page]

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

DORA SOLARES,

Case No. 1:20-cv-00323-LHR-BAM

Plaintiff,

**[PROPOSED] STIPULATED  
AMENDED SCHEDULING AND  
DOCKET CONTROL ORDER; AND  
ORDER THEREON**

v.

Hon. Lee H. Rosenthal

RALPH DIAZ, in his individual capacity, KENNETH CLARK, in his individual capacity, JOSEPH BURNS, in his individual, and DOES 1 TO 15, in their individual capacities

Defendants.

**COME NOW** Plaintiff Dora Solares and Defendants Burns, Gallemore, Gamboa, Garcia, Loza, Maytubby, Munoz, and Pena and Defendant Silva and

1 hereby stipulate and submit the following proposed amended schedule to control  
2 the above-listed matter:

3  
4 1. August 22, 2025

**COMPLETION OF NON-EXPERT  
DISCOVERY**

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6 Written discovery requests are not  
7 timely if they are filed so close to this  
8 deadline that under the Federal Rules of  
9 Civil Procedure the response would not  
10 be due until after the deadline.

11  
12 2. September 5, 2025

**EXPERTS ON MATTERS OTHER  
THAN ATTORNEYS' FEES**

13 The plaintiff (or the party with the  
14 burden of proof on an issue) will  
15 designate expert witnesses in writing  
16 and provide the report required by Rule  
17 26(a)(2) of the Federal Rules of Civil  
18 Procedure.

19  
20 3. October 3, 2025

**OPPOSING EXPERTS**

21 The opposing party will designate  
22 expert witnesses in writing and provide  
23 the report required by Rule 26(a)(2) of  
24 the Federal Rules of Civil Procedure.

25  
26 4. October 24, 2025

**CLOSE OF EXPERT DISCOVERY**

27  
28 5. November 21, 2025

**PRETRIAL DISPOSITIVE  
MOTIONS DEADLINE**

No motion may be filed after this date  
except for good cause.

1           6. January 9, 2026

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**JOINT PRETRIAL ORDER AND**  
**MOTION IN LIMINE DEADLINE**

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The Joint Pretrial Order will contain the pretrial disclosures required by Rule 26(a)(3) of the Federal Rules of Civil Procedure. Plaintiff is responsible for timely filing the complete Joint Pretrial Order. Failure to file a Joint Pretrial Order timely may lead to dismissal or other sanction in accordance with the applicable rules.

7. January 23, 2026

**DOCKET CALL**

Docket Call will be held at 2:00 p.m. in a location to be determined. No documents filed within 7 days of the Docket Call will be considered. Pending motions may be ruled on at docket call, and the case will be set for trial as close to the docket call as practicable.

Any party wishing to make any discovery motions should arrange for a pre-motion conference with the court before the preparation and submission of any motion papers. That includes a motion to compel, to quash, or for protection. Email Glenda Hassan at [glenda\\_hassan@txs.uscourts.gov](mailto:glenda_hassan@txs.uscourts.gov) or fax her at 713-250-5213 to arrange for a pre-motion conference. Notify your adversary of the date and time for the conference.

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1  
2 Respectfully submitted,  
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4 Dated: June 3, 2025  
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LAW OFFICES OF ERIN DARLING  
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7 By:  
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9  
10 /s/  
11 Erin Darling,  
12 Attorneys for Plaintiff Dora Solares  
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14 Dated: June 3, 2025  
15

Respectfully submitted,  
16

17 ROB BONTA  
18 Attorney General of California  
19 JON S. ALLIN  
20 Supervising Deputy Attorney General  
21

22 /s/*Jeremy Duggan (as authorized on*  
23 *6/3/25)*

24 JEREMY DUGGAN  
25 Deputy Attorney General  
26 *Attorneys for Defendants*  
27 *Burnes, Gallemore, Gamboa, Garcia,*  
28 *Maytubby, Munoz, Loza, and Pena*

19 Dated: June 3, 2025  
20

ANDRADA & ASSOCIATES  
21

22 /s/*Lynne G. Stocker (as authorized*  
23 *on 6/2/25)*

24 By: Lynne G. Stocker  
25 *Attorneys for defendant SILVA*  
26

27 IT IS SO ORDERED.  
28

Dated: June \_\_\_\_\_. 2025

Lee H. Rosenthal  
Senior United States District Judge